

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re: Deposition of Ethan Dornhelm in

Omar Santos and Amanda Clements on behalf of themselves and all others similarly situated,

3:21-mc-80008 KAW

~~Case No. 1:19-cv-23084-KMW (District Court Southern District of Florida, Miami Division)~~

**STIPULATED PROTECTIVE ORDER
REGARDING DEPOSITION OF
ETHAN DORNHELM**

**Healthcare Revenue Recovery Group, LLC
d/b/a ARS Account Resolution Services and
Experian Information Solutions, Inc.**

Defendant.

Pursuant to Rules 26(c) and 45(d)(3) of the Federal Rules of Civil Procedure, non-party witness Ethan Dornhelm (“Dornhelm”), and Omar Santos and Amanda Clements (“Plaintiffs”) (collectively, the “Parties”) enter into this Stipulated Protective Order in connection with a subpoena issued by plaintiffs to take the deposition of Dornhelm in this District (the “Subpoena”), to be used in *Santos, et al. v. Healthcare Revenue Recovery Grp. LLC et al*, No. 1:19-cv-23084-KMW (S.D. Fla. Miami Division) (the “Underlying Action”). The protections provided by this Stipulated Protective Order are in addition to, and not in lieu of, the Protective Order in the Underlying Action. (See *Santos, et al. v. Healthcare Revenue Recovery Grp. LLC et al*, No. 1:19-cv-23084-KMW, ECF No. 38-1 (Jan. 7, 2020)).

The Parties agree that to prevent the imposition of undue burden and expense, annoyance, embarrassment, or oppression on non-party Dornhelm, and to prevent the disclosure of trade secrets or other confidential research, development, or commercial information belonging to Dornhelm's employer, FICO, which has not been served with any subpoena, good cause exists to limit a deposition of Dornhelm to specific topics, and that any deposition of Dornhelm shall be limited to examination of the following topics ("Topics"):

1 1. The different roles played by FICO, Experian, and those who request credit reports,
2 with respect to the calculation of FICO scores and the preparation and delivery of credit reports.
3

4 2. Through what method or procedures does Experian provide data on Collection
5 Accounts (as defined in Paragraph 4 of the Dornhelm Declaration) to FICO.

6 3. Whether “Date of Status” and “Date Open” fields for Collection Accounts are
7 utilized by the FICO score.

8 4. Knowledge of the contents of the Declaration signed by Dornhelm on April 20,
9 2020 in the Underlying Action (the “Dornhelm Declaration”).

10 5. The effect of payment history, or the lack thereof, on Collection Accounts reported
11 by Experian and whether it can affect a consumer's FICO score.

12 The Parties agree that any questions to Dornhelm on matters outside of the Topics are
13 outside the proper scope of the deposition, that Dornhelm's counsel may instruct Dornhelm not to
14 answer such questions, and that Dornhelm shall not be required to answer such questions. If
15 Plaintiffs repeatedly attempt to examine Dornhelm on matters outside of the Topics, Dornhelm
16 may terminate the deposition in complete satisfaction of his obligations under the Subpoena.
17

18 The Parties agree that no party or non-party may use information obtained in this litigation
19 for any purpose except the litigation.

20 By stipulating to the entry of this Protective Order no Party waives any right it otherwise
21 would have to object to disclosing or producing any information or item on any ground not
22 addressed in this Stipulated Protective Order. Similarly, no Party waives any right to object on any
23 ground to use in evidence any of the material covered by this Stipulated Protective Order. The
24 Parties reserve all other rights in full to the extent not expressly addressed in this Stipulated
25 Protective Order.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

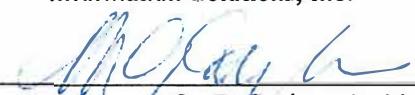
DATED: 1/13/2021


Attorneys for Plaintiff

DATED: _____

Attorneys for Defendant Experian
Information Solutions, Inc.

DATED: 1/12/2021


Attorneys for Defendant Healthcare
Revenue Recovery Group, LLC

DATED: 1/13/2021


Attorneys for Non-Party Ethan Dornhelm

~~PURSUANT TO STIPULATION, IT IS SO ORDERED.~~

DATED: _____

~~United States District/Magistrate Judge~~

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: _____

Atorneys for Plaintiff

DATED: 1/13/21



Atorneys for Defendant Experian
Information Solutions, Inc.

DATED: _____

Atorneys for Defendant Healthcare
Revenue Recovery Group, LLC

DATED: _____

Atorneys for Non-Party Ethan Dornhelm

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: January 20, 2021

